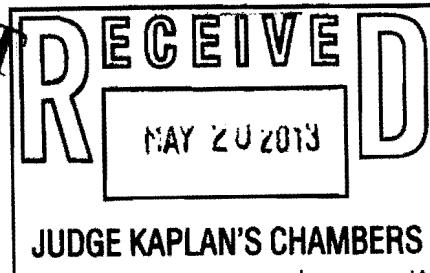


**Brownstein Hyatt
Farber Schreck**

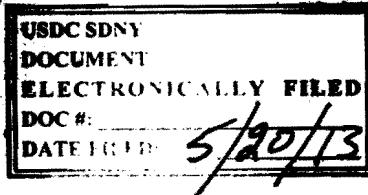


May 17, 2013

Lawrence W. Treece
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VIA COURIER & FEDERAL EXPRESS

The Honorable Lewis A. Kaplan
United States District Judge
United States Courthouse
500 Pearl Street
New York, NY 10007



RE: Chevron Corp. v. Donziger, 11 Civ. 0691 (LAK); Statement of Non-Party Brownstein Hyatt Farber Schreck, LLP Re: Plaintiff Chevron's Motion to Compel Production of Privileged Documents and Deposition of John V. McDermott.

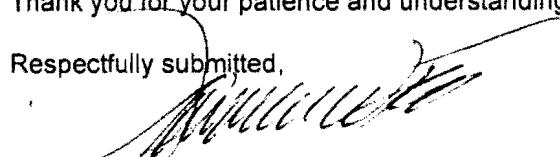
Dear Judge Kaplan:

I apologize for writing again, particularly so soon, but I thought this necessary to avoid confusion to both the Court and the parties. I received a copy of the parties' agreement regarding the subpoena served on Brownstein, and the Court's Order of May 17, 2013 issued pursuant to that agreement ("May 17 Order"), after I sent my first letter. This is to inform the Court and the parties that the May 17 Order fully alleviates Brownstein's concerns as expressed in my previous letter of today. Accordingly:

- A. Brownstein will be producing all documents contained on its privilege log pursuant the May 17 Order. These documents will be delivered early this afternoon Mountain Time to Gibson, Dunn & Crutcher for distribution to the other parties.
- B. Mr. McDermott will testify on May 21 pursuant to the May 17 Order, which Brownstein interprets as relieving it of all obligations to interpose objections to the disclosure of attorney/client privileged and work product information. Mr. McDermott will answer all questions to which the Defendants make no objection based on the assertion of privilege or work product. Should any Defendant interpose a privilege or work product objection, Mr. McDermott will not answer the question to which objection is made until the objection is resolved by the Master or by the Court.

Thank you for your patience and understanding.

Respectfully submitted,


Lawrence W. Treece

LWT:mm

cc: Attached List

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